

**EXHIBIT A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION, *et al.*,

Defendants.

PROMESA  
Title III

No. 17 BK 3283-LTS (Jointly  
Administered)

Adv. Proc. No. 20-00003-LTS

PROMESA  
Title III

<sup>1</sup> The Debtors in these jointly-administered Title III cases, along with each Debtor's respective Title III case number (listed as a bankruptcy case number due to software limitations) and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION, *et al.*,

Defendants.

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION, *et al.*,

Defendants.

Adv. Proc. No. 20-00004-LTS

PROMESA

Title III

Adv. Proc. No. 20-00005-LTS

PROMESA

Title III

**ORDER GRANTING OFFICIAL COMMITTEE OF UNSECURED CREDITORS'  
URGENT CROSS-MOTION FOR STAY RELIEF GRANTING LEAVE TO FILE  
LIMITED OBJECTION, OR IN ALTERNATIVE, TO INTERVENE**

The Court, having considered the *Official Committee Of Unsecured Creditors' Urgent Cross-Motion For Stay Relief Granting Leave To File Limited Objection, or in Alternative, to Intervene* (the “Cross-Motion”), and the Court determining that (i) the Court has subject matter jurisdiction over the Cross-Motion pursuant to 48 U.S.C. § 2166(a); (ii) venue of this proceeding and the Cross-Motion is proper under 48 U.S.C. § 2167(a); (iii) notice of the Cross-Motion was adequate and proper under the circumstances and that no further or other notice need be given; and (iv) good cause appearing therefor, it is hereby ORDERED, ADJUDGED AND DECREED THAT:

1. The Cross-Motion is granted. The Revenue Bonds CMO is amended to permit the Committee to file limited objections (the “Objections”) to the Proofs of Claim filed by the Defendants.
2. The Objections will be filed and considered on the same schedule as the filing and briefing of any Motions for Partial Summary Judgment filed by the Oversight Board in the Revenue Bond Adversary Proceedings.
3. The Objections would be limited to the matters at issue in the counts that will be subject to the Oversight Board’s Motions for Partial Summary Judgment.
4. The Objections will be subject to the requirements of the Revenue Bonds CMO, including Section 9 and the obligation to use reasonable efforts to ensure that its arguments are not duplicative or repetitious of those set forth in the Oversight Board’s Motions for Partial Summary Judgment.
5. Any Objection filed by the Committee that expressly incorporates a portion of the Oversight Board’s Motions for Partial Summary Judgment will be considered included in the Committee’s objection for all purposes, including for preservation of rights on appeal.

6. The Court retains subject matter jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: May \_\_\_, 2021

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LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE